

UNITED STATES DISTRICT COURT  
DISTRICT OF MAINE

|                            |   |                     |
|----------------------------|---|---------------------|
| PHILIP RIPTON              | ) |                     |
|                            | ) |                     |
| Plaintiff,                 | ) |                     |
|                            | ) |                     |
| v.                         | ) | CASE NO. 1:07-cv-20 |
|                            | ) |                     |
| CAMP DRESSER & MCKEE, INC. | ) |                     |
| and CAMP DRESSER & MCKEE   | ) |                     |
| BUILDERS, INC. f/k/a CDM   | ) |                     |
| CONSTRUCTORS, INC.         | ) |                     |
|                            | ) |                     |
| Defendants.                | ) |                     |

**PLAINTIFF'S MOTION TO AMEND COMPLAINT**

NOW COMES the Plaintiff, by and through undersigned counsel, and requests leave to file an amended complaint for the following reasons:

1. Based upon Defendants' representations, Camp Dresser & McKee Builders, Inc. never employed Plaintiff. Instead, according to Defendants, CDM Constructors, Inc. employed Plaintiff.

2. CDM Constructors, Inc. was and is a wholly owned subsidiary of Camp Dresser & McKee, Inc. Plaintiff alleges that both entities were his employers for purposes of this action.

3. Therefore, Plaintiff requests leave to amend his complaint to include CDM Constructors, Inc. as a Defendant and to dismiss his claims against Camp Dresser & McKee Builders, Inc.

4. A copy of the proposed First Amended Complaint is attached hereto.

Respectfully submitted,

Date: May 4, 2007

/s/ Peter L. Thompson

Peter L. Thompson

Attorney for Plaintiff

Peter Thompson & Associates

92 Exchange Street, 2d Floor

Portland, Maine 04101

(207) 874-0909

### **CERTIFICATE OF SERVICE**

I certify that I served the foregoing document upon all counsel of record through this Court's electronic filing system on the date below.

Date: May 4, 2007

/s/Peter L. Thompson